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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:10-CR-275-RFB-(GWF)
)	
Plaintiff,)	United States Of America's Motion To
)	Reseal ECF Nos. 114, 116, 118, and 119
v.)	and Replace the Documents with Redacted
)	Copies Pursuant to Fed. R. Crim. P. 49.1
BRADLEY TUBIN,)	And Order
)	
Defendant.)	

The United States of America respectfully requests this Court to reseal the United States of America's Sealed Ex Parte Second Motion to Substitute and to Forfeit Property of Bradley Tubin (ECF No. 114); the order granting the Second Substitution and Forfeiture Order (ECF No. 116); the sealed Notice of Errata attaching Proposed Amended Second Substitution and Forfeiture Order (ECF No. 118); and the sealed Notice of Errata attaching Amended Second Substitution and Forfeiture Order (ECF No. 119) because they contain personally identifiable information and to replace the aforementioned documents with redacted copies. See attached documents.

This motion is based on the attached Memorandum of Points and Authorities.

MEMORANDUM OF POINTS AND AUTHORITIES

Fed. R. Crim. P. 49.1 protects social security numbers, taxpayer-identification numbers, birth dates, and financial-account numbers. Fed. R. Crim. P. 49.1(a). The aforementioned

1 documents (ECF Nos. 114, 116, 118, and 119) contain numbers identifying the account which
2 was seized and Bradley Tubin's social security number. Although "[t]he redaction requirement
3 does not apply to . . . a financial-account number or real property address that identifies the
4 property allegedly subject to forfeiture in a forfeiture proceeding..." (Fed. R. Crim. P.
5 49.1(b)(1)), in an abundance of caution, the United States requests to reseal the above-named
6 documents and to replace them with the attached redacted documents to protect Bradley Tubin's
7 personal identifying information.

8 This Court has authority to file redacted documents for the public record. Fed. R. Crim.
9 P. 49.1(d). This Court retains the unredacted Motion and Order under seal as part of the record.
10 Fed. R. Crim. P. 49.1(f). By filing the attached redacted documents, the public will have some
11 knowledge concerning this case, but the sensitive information will be protected. The United
12 States will serve the potential claimants the redacted Motions and Orders and file the redacted
13 Motions and Orders with the service of process return.

14 For this reason, this Court should reseal the above named documents (ECF Nos. 114,
15 116, 118, and 119) and replace the documents with the provided redacted copies.

16 DATED this 8th day of August, 2018.

17 DAYLE ELIESON
18 United States Attorney

19 /s/ Daniel D. Hollingsworth
20 DANIEL D. HOLLINGSWORTH
21 Assistant United States Attorney

22
23 IT IS SO ORDERED.

24
25 

26 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: August 21, 2018.

PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on August 8, 2018.

/s/ Heidi L. Skillin
HEIDI L. SKILLIN
FSA Paralegal